

**mheller@sabety.net**

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**From:** Yaakov Saks <[ysaks@SteinSaksLegal.com](mailto:ysaks@SteinSaksLegal.com)>  
**Sent:** Tuesday, July 16, 2019 3:57 PM  
**To:** [ted@sabety.net](mailto:ted@sabety.net); David Force  
**Cc:** [mheller@sabety.net](mailto:mheller@sabety.net)  
**Subject:** RE: Adjournment of Pre Trial Conference Traynor v Hereafter

We are pre discovery I am not sure how we could have proven liability yet, but this is not about the merits. I can offer 7500- but need to know by 12 tomorrow. If there is a counter I could pass it on but unlikely to be accepted.

Yaakov

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**From:** ted sabety <[ted@sabety.net](mailto:ted@sabety.net)>  
**Sent:** Tuesday, July 16, 2019 3:43 PM  
**To:** Yaakov Saks <[ysaks@SteinSaksLegal.com](mailto:ysaks@SteinSaksLegal.com)>; David Force <[dforce@SteinSaksLegal.com](mailto:dforce@SteinSaksLegal.com)>  
**Cc:** [mheller@sabety.net](mailto:mheller@sabety.net)  
**Subject:** RE: Adjournment of Pre Trial Conference Traynor v Hereafter

I have seen no evidence of liability under any of the statutes, but whats your number ?

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**From:** Yaakov Saks <[ysaks@SteinSaksLegal.com](mailto:ysaks@SteinSaksLegal.com)>  
**Sent:** Tuesday, July 16, 2019 3:29 PM  
**To:** [ted@sabety.net](mailto:ted@sabety.net); David Force <[dforce@SteinSaksLegal.com](mailto:dforce@SteinSaksLegal.com)>  
**Cc:** [mheller@sabety.net](mailto:mheller@sabety.net)  
**Subject:** RE: Adjournment of Pre Trial Conference Traynor v Hereafter

Ted,

We are finalizing our responses to the motion tomorrow and nice that the Judge has oral argument so soon. My client though urged me to reach out and see if he were to make a revised much lower demand would your client entertain it. This is straight my client and not me even since I have done the work. Please advise asap.

Thanks

Yaakov

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**From:** Yaakov Saks  
**Sent:** Wednesday, July 10, 2019 12:09 PM  
**To:** 'ted@sabety.net' <[ted@sabety.net](mailto:ted@sabety.net)>; David Force <[dforce@SteinSaksLegal.com](mailto:dforce@SteinSaksLegal.com)>  
**Cc:** [mheller@sabety.net](mailto:mheller@sabety.net)  
**Subject:** RE: Adjournment of Pre Trial Conference Traynor v Hereafter

That is fine by us. Please include David Force cc here on the emails.

Thanks

Yaakov

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**From:** ted sabety <[ted@sabety.net](mailto:ted@sabety.net)>  
**Sent:** Wednesday, July 10, 2019 12:08 PM  
**To:** Yaakov Saks <[ysaks@SteinSaksLegal.com](mailto:ysaks@SteinSaksLegal.com)>  
**Cc:** [mheller@sabety.net](mailto:mheller@sabety.net)  
**Subject:** Adjournment of Pre Trial Conference Traynor v Hereafter

I suggest that in light of the court granting your request to file your opposition by July 17, that we ask the court to adjourn the pre trial conference by two weeks. If you agree, please let me know. The deadline to file for adjournment is today. If I don't hear from you, I will assume it is not consented and will file the request by COB today.

Thanks



Ted Sabety

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